

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MARSHALL TAYLOR,

Plaintiff,

v.

CHIEF ALFORD WADSWORTH,

Defendant.

2:05-cv-745-A

MARSHALL TAYLOR,

Plaintiff,

v.

CHIEF ALFORD WADSWORTH

Defendant.

2:05-cv-800-T

REQUESTS FOR PRODUCTION OF DOCUMENTS TO
PLAINTIFF MARSHALL TAYLOR

COMES NOW Defendant Chief Alfred Wadsworth, by and through counsel,
and propounds the following Requests for Production of Documents to Plaintiff
Marshall Taylor to be answered in accordance with the *Federal Rules of Civil
Procedure*.

1. Provide a copy of your State and Federal income tax returns for the last five
(5) years *prior to the incident(s)*, and provide a copy of all State and Federal income
tax returns *since the date of the incident(s)* made the basis of this suit.

2. For each and every doctor, hospital, or health care provider that has treated you or examined you for injuries sustained in the incident(s) made the basis of this suit, provide the following:

- a. Copies of all bills rendered for any doctor, hospital, or health care provider;
- b. Copies of all medical records related to the incident(s) in question from each doctor, hospital, or health care provider; and
- c. Copies of all documents relating to any payment of said medical bills by any third-party payer.


3. For each expert that you intent to have testify at trial, provide a copy of the current resume of the expert, and provide a copy of any report prepared by said expert for use in this case.

4. Provide a copy of any photograph, video tape, film, disc, drawing, painting, or visual image or representation in any media whatsoever in your possession, or subject to your control, of the persons and evil spirits involved in the incident(s) made the basis of this lawsuit, and of the incident(s) scenes, taken or made on the date(s) of the incident(s) made the basis of this lawsuit, or within twelve (12) months before or after. *(Please note that this request is not for trial exhibits, but rather is for material discoverable under the Federal Rules of Civil Procedure to be provided within 30 days.)*

5. Provide a copy of any and all documents in your possession or subject to your control that relate to the claims in this case, whether the documents support your contentions, or whether they are adverse to your contentions. *(Please note that this request is not for trial exhibits, but rather is for material discoverable under the Federal Rules of Civil Procedure to be provided within 30 days.)*

6. Provide a copy of each and every document that you intend to introduce at the trial of this case.

7. Provide a copy of each and every estimate, bill, and receipt for the repair of damages to your home and personal property as a result of the incident(s) made the basis of this lawsuit.


ALEX L. HOLTSFORD (ASB-9586-D62A)
S. MARK DUKES (ASB-9697-U77S)
Counsel for Defendant Alfred Wadsworth

OF COUNSEL:

Nix, Holtsford, Gilliland, Higgins & Hitson, P.C.
P.O. Box 4128
Montgomery, AL 36103-4128
334-215-8585 - Phone
334-215-7101 - Facsimile

CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed, postage prepaid, an exact copy of the foregoing document to

Mr. Marshall Taylor
229 Lewis Street
Prattville, AL 36067

on this the 21st day of November 2005.


OF COUNSEL